

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS SMITH
TO PUBLIC REPRESENTATIVE INTERROGATORIES PR/USPS-T4-3(a) and 4(g),
REDIRECTED FROM WITNESS NERI
(January 6, 2012)**

United States Postal Service witness Marc Smith (USPS-T-9) provides responses to the above-listed interrogatories of the Public Representative dated December 21, 2011. The interrogatories have been redirected from Postal Service witness Frank Neri (USPS-T-4). Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SMITH
TO PUBLIC REPRESENTATIVE INTERROGATORY
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PR/USPS-T-4-3

Many Periodicals flats continue to be sorted manually, particularly in the incoming secondary sort, despite the apparent abundance of automated equipment for sorting today's sharply reduced number of flats. Please comment on whether you believe the consolidation into a network of fewer facilities will help increase automation of the sorting of Periodicals and other flats. If you believe it will lead to increased automation and reduced manual sorting, please quantify the impact to the extent possible. In particular:

- a. In non-FSS zones, approximately what is the probability that a non-carrier route Periodicals flat today will receive incoming secondary sorting on a piece sorting machine capable of reading an intelligent mail barcode (IMB)?

RESPONSE:

- a. Information on this can best be obtained from the Periodicals Flat cost model (USPS-FY11-11, "PER OC flats.xls") filed in Docket No. ACR2011. Worksheet 'ACR Modifications' cell 'D75' indicates that in FY2011, 84.25% of RPW non-CR flats of all classes received a mechanized Incoming Secondary sort on flat sorting equipment. Flat sorting equipment includes the AFSM 100 and the UFSM 1000, both of which have IMB read capability.

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PR/USPS-T-4-4

Your testimony, starting at page 9, describes the various types of machines used to sort parcels in mail processing facilities, e.g. the APPS, the APBS, the SPBS and the LIPS machines.

- g. For flats bundles to non-FSS zones, approximately what is the probability today that they will be sorted on bundle sorting machines capable of capturing IMB barcodes on the bundles, and what will be the corresponding probability in the reduced and modified network you describe?

RESPONSE:

- g. Information relevant to today's probability that a flats bundle in a non-FSS zone will be sorted on bundle sorting equipment able to read the IMB can be obtained from the Periodicals Flat cost model (USPS-FY11-11, "PER OC flats.xls", worksheet 'Coverage Factors') filed in Docket No. ACR2011. However, this is for FY 2011. As witness Neri's responses to the other parts of this question indicate, some of the bundle sorting equipment in use during FY 2011 and today is unable to read the IMB, but the percentage of this equipment unable to read the IMB is declining. I am informed that, under the proposed network, an increase is expected in the probability that flats bundles in a non-FSS zone will be sorted on bundle sorting equipment able to read the IMB. However, the extent of the increase is not yet known.